

UNITED STATES DISTRICT COURT

for the

Western District of Washington

Division

CSG WA LLC , Pro Se
on Behalf of Kelley Sharp

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Joseph Brown
Darlene Brown
Brown J Construction Inc
John Doe and Jane Doe 1-100

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. 2:20-cv-01701 JCC

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	CSG WA LLC on behalf of Kelley Sharp
Street Address	16375 NE 44 th Court
City and County	Redmond , King County
State and Zip Code	Washington 98052
Telephone Number	9076512444
E-mail Address	

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title *(if known)*. Attach additional pages if needed.

Defendant No. 1

Name	Joseph Brown
Job or Title <i>(if known)</i>	Owner / Unlicensed "Contractor"
Street Address	8 Katherine Place
City and County	Gulfport, Harrison County
State and Zip Code	Mississippi 39503
Telephone Number	228-731-6791
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	Darlene Brown
Job or Title <i>(if known)</i>	Owner / Unlicensed "Contractor"
Street Address	8 Katherine Place
City and County	Gulfport, Harrison County
State and Zip Code	Mississippi 39503
Telephone Number	228-731-6791
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	Brown J Construction Inc
Job or Title <i>(if known)</i>	Fake Company / Supposed Buisness of Defendant # 1 and # 2
Street Address	8 KATHERINE Place
City and County	Gulfport, Harrison County
State and Zip Code	Mississippi 39503
Telephone Number	228-731-6791
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	John Doe and Jane Doe 1-100
Job or Title <i>(if known)</i>	Additional Family or Associates
Street Address	
City and County	
State and Zip Code	
Telephone Number	

E-mail Address (if known) _____

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) _____, is a citizen of the
State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) CSG WA LLC, is incorporated
under the laws of the State of (name) Washington,
and has its principal place of business in the State of (name)
Washington State.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) Joseph Brown, is a citizen of
 the State of (name) Mississippi. Or is a citizen of
 (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) Brown J Const Inc, is incorporated under
 the laws of the State of (name) Mississippi, and has its
 principal place of business in the State of (name) Mississippi.
 Or is incorporated under the laws of (foreign nation) _____
 and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

The "Plaintiffs" are seeking the amount of \$180,000.00 to Restore Justice in this matter due to Costs involved with:

1. Hiring Licensed Contractors to repair and finish the work
2. Legal Costs incurred to address and handle the Fraudulent Lien
3. Due Diligence Costs needed and necessary to Investigate the Defendants
4. Costs involved to persue Justice in this matter
5. Loss of Revenue due to Delaying the Sales of the Home with Fraudulent Liens

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

The "Plaintiff" is entitled to damages in this Case and the Requested amount of "Relief" due to the actions of the "Defendants".

1. The Defendants deceived the "Plaintiffs" by leading the "Plaintiffs" to believe they were Licensed Contractors, when in fact, they were not.
2. The Defendants did enter into a Contract with the "Plaintiffs" for the sole purpose of deceiving them and committing Theft by Deception. Also the Defendants had no Intention to Fulfill the Contract and only entered into it to deceive the "Plaintiffs".
3. The Defendants deceived the "Plaintiffs" repeatedly for the purpose of getting "Draws" against the contract and also for the purpose of deceiving the "Plaintiffs" to think damage to the home required additional work and change orders.
4. The Defendants deceived the "Plaintiffs" by using their store accounts and purchasing unauthorized tools and products at "Home Depot" and keeping the tools and products for themselves.
5. The Defendants filed an Illegal Lien on the Home stating Non Payment, the Lien was Fraudulent and Claimed a False and Fraudulent Dollar Amount. When in fact the Defendants had been paid in Full for the Contract and the Lien was filed to harass and blackmail the "Plaintiffs".
6. Additional Costs to ready the home for sale after the Defendants damaged the home with their work which was unlicensed and not done correctly.
7. The Defendants presented the "Plaintiffs" with false accounting and contracts in order to deceive the "Plaintiffs".
8. The Defendants used Threats of Physical Violence and Damaging the "Plaintiffs" Reputation to Blackmail and to also Harass and Intimidate them.

The Defendants did commit "Conversion" as well as "Theft by Deception" as part of the Acts to Defraud the "Plaintiffs" of their property. The Defendants additionally engaged in "Racketeering" and "Bank Fraud" as part of the actions against the "Plaintiffs".

Furthermore, the actions of the Defendants against the "Plaintiffs" fall under the (RICO ACT) and allow for extended Civil Actions.

Additionally, the "Plaintiffs" ask the Court to look at the evidence in this matter of Conspiracy as the Defendants involved Family Members to perpetrate this Scam. Also noting through Evidence the "Plaintiffs" will show this is not an isolated incident by the Defendants but a repeated course of conduct and action.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

The "Plaintiffs" are seeking the Courts to order the Defendants to pay the Amount of Relief Sought of \$180,000.00 to restore Justice in this matter. Additionally the "Plaintiffs" are asking the Court to look at the matters involving:

1. Conversion
2. Theft by Deception
3. Racketeering
4. Bank Fraud
5. Rico Violations

The Plaintiffs seek the Court to Order the Defendants to Pay the Requested Relief in this matter to Restore Justice.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 10/28/2020

Signature of Plaintiff

Printed Name of Plaintiff

Michael Williams for CSG WA LLC on behalf of Kelley Sharp

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

E-mail Address